

4

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

v.

D-1 JEROME BROWN and
D-2 DWAYNE BROWN,

Defendants.

Case: 2:22-cr-20680

Judge: Cox, Sean F.

MJ: Altman, Kimberly G.

Filed: 12-21-2022

USA VS SEALED MATTER (DP)

Violation:

21 U.S.C. § 841(a)(1)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

**DISTRIBUTION OF FENTANYL; DEATH RESULTING
21 U.S.C. § 841(a)(1)**

D-1 JEROME BROWN
D-2 DWAYNE BROWN

On or about February 15, 2022, in the Eastern District of Michigan, the defendants, JEROME BROWN and DWAYNE BROWN, knowingly and intentionally distributed a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the controlled substance involved was a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as

fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

It is further alleged that the death of another person, "Victim 1," whose identity is known to the Grand Jury, resulted from the use of the controlled substance so distributed, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(b)(1)(C).

FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853 and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense set forth above in this Indictment, the defendants shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853 and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation and any

property used, or intended to be used, in any manner or part, to commit,
or to facilitate the commission of such violation.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

s/ Benjamin Coats
Benjamin Coats
Chief, Drug Task force Unit

s/ Paul A. Kuebler
Paul A. Kuebler
Assistant United States Attorney

Dated: December 21, 2022

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>Bak</i>

Case Title: USA v. Jerome Brown et al.

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

December 21, 2022
Date


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 Assistant United States Attorney
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 Attorney Bar #: NY4268561

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.